

## **EXHIBIT 15**

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# Transcript of the Testimony of **Jennifer Lynn Hunter**

**Date:** April 26, 2010

**Case:** David Lee Womack v. Joseph V. Smith, et al.,

Printed On: 5/5/2010



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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
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6       DAVID LEE WOMACK,                                   : CIVIL ACTION

7                           Plaintiff                                   :

8                       vs.   :

9       JOSEPH V. SMITH, et al.,                               :

10                           Defendants                               : NO. 1:CV-06-2348 CCC

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12                                   \*   \*   \*

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14                   Oral deposition of JENNIFER LYNN HUNTER,  
15       Psy.D., taken at USP Lewisburg, Training Center,  
16       2400 Robert F. Miller Drive, Lewisburg,  
17       Pennsylvania 17837, on Monday, April 26, 2010,  
18       beginning at 10:32 before Nancy J. Taguinot, RPR,  
19       CCR(NJ), Registered Professional Reporter and  
20       Notary Public in and for the Commonwealth of  
21       Pennsylvania.  
22

1     that to your attention. So the rounds are not --  
2     again, it's not a formal going door to door  
3     speaking necessarily with every individual. It's  
4     kind of being there, making yourself available if  
5     issues were brought to your attention.

6           Q.       How frequently would you do rounds in  
7     the SHU?

8           A.       Someone from psychology would do rounds  
9     at least once a week. It wouldn't always be me.  
10    That would, you know, certainly depend kind of on  
11    scheduling and opportunity. Oftentimes it might be  
12    my supervisor or any of the other psychologists.  
13    But somebody from the psychology department would  
14    once a week do rounds on each floor.

15          Q.       And when that person from psychology  
16    goes to make rounds in the SHU, do they typically  
17    sign or initial an entrance log into the SHU?

18          A.       Yes.

19          Q.       Is that required by BOP policy?

20          A.       I believe so.

21          Q.       And during the time period in question,  
22    which is from February 2004 to February 2005, were

1           A.       I do not know.

2           Q.       We can put that document to the side  
3       for the time being.

4                   Did Mr. Womack face a substantial risk  
5       of harm by being placed in restraints for an  
6       extended period of time?

7           A.       What would "substantial risk of harm"  
8       be?

9           Q.       Could he have been physically injured  
10       by being placed in restraints for an extended  
11       period of time?

12          A.       I wouldn't really be able to answer  
13       that as far as medically. I don't know. I know  
14       they do have to do regular checks of the restraints  
15       to ensure that, you know, the circulation isn't  
16       compromised and other -- other things to -- again,  
17       to ensure that medically they're not causing  
18       problems.

19          Q.       And are there any psychological harms  
20       that could result from the extended use of  
21       restraints?

22          A.       Possibly, yes.

1 Q. Such as what?

2 A. It would be very -- you know,  
3 individual to the person involved. You know,  
4 certainly in the same way as anybody placed in the  
5 Special Housing Unit sometimes can have some  
6 increased stress. So particularly we would be more  
7 concerned about somebody that maybe has documented  
8 mental illness, potential to decompensate.

9 Q. What does decompensate mean?

10 A. Generally, just to -- maybe for them  
11 to -- for their condition to worsen, maybe for  
12 symptoms to get more severe or maybe for symptoms  
13 to kind of emerge that maybe had been -- had not  
14 been present before.

15 Q. And you had mentioned increased stress.  
16 What do you mean by that?

17 A. Well, the stressful environment,  
18 certainly can cause some people to have some mental  
19 health kind of reaction or response to that.

20 Q. And would be it fair to say that the  
21 longer someone remains in restraints, the more harm  
22 they can be at risk of?